



ATTACHMENT A

Remarks

Considering the matters raised in the Office Action in the same order as raised, claims 4, 6, 9, 29 and 30 have been rejected under 35 USC 112, second paragraph, as being "indefinite." The claims have been amended to provide consistency between the phrases used in parent claim 1 and the remaining claims. The Examiner is thanked for the patience shown in pointing out the inconsistency in question; applicant had not previously appreciated the nature of the rejection here.

Claims 1-3, 5 and 10-12 have been rejected under 35 USC 102(b) as being "anticipated by" the Mano reference. This rejection is respectfully traversed.

Independent claim 1 recites, inter alia, that a plurality of utilization devices are communicatively coupled to respective ports of the plurality of ports and that a step of configuring a user-interface operating on the information handling system is based on (i) the predetermined utilization of the devices of the plurality of ports and also based on (ii) a defined relationship defined between the ports. As set forth in the previous response, this defining of a relationship between the ports is disclosed at, e.g., page 7, the last sentence of the last paragraph. As discussed in the specification, this "defined relationship" may take a number of different forms as described, for example, in the second paragraph on page 9 and the second paragraph on page 8. For example, the relationship can be one that indicates the importance of the devices to the users or can be based on some other priority. In other examples, the relationship can be a physical one so that, as described at page 9, if one device were plugged into the left of another device, the corresponding content of the first device may appear to the left and/or adjacent to the other device on a user interface. Further, priority can be assigned based on temporal considerations wherein the later connected peripheral device is given higher priority than a peripheral device that has already been connected, or wherein priority is assigned using a look-up table or based on heuristic data. A number of other examples are provided in the specification and the invention is, of course, not limited to the specific examples.

Turning to the Mano patent, in rejecting claim 1, the Examiner contends that Mano "produces a series of illustrations in the operator interface of devices that are connected to a data processing system, as appear in figs 1-4" and that "[t]hese show

the data being transmitted from one device to another, and in so representing the utilization of the devices, are illustrative of a graphical user interface that is configured, based upon device utilization via a plurality of ports that have 'a relationship defined between' them, as in the following comparison to those claims still rejected using this ground."

In reading claim 1 on the reference, the Examiner refers to lines 60-62 of column 2 and lines 2-8 of column 3 as disclosing "configuring a user-interface operating on the information handling system based on the determined utilization by the devices of the ports of the plurality of ports." The Examiner further contends that "[t]his interface shows the 'relationship defined between the ports' as the visual indication that devices are connected" and that the " 'relationship' is membership in such a set of connected devices.'

Considering the passages cited by the Examiner, lines 60-62 of column 2 merely provide that a GUI displays graphical images representing devices connected to a bus structure and that the bus structure is also graphically represented and illustratively coupled to each of the graphical device images. Lines 2-10 of column 3 provide that "[w]hen a device is added to the serial bus, a graphical image representing that device is automatically displayed in the graphical user interface." These lines also provide that "when a device is removed by the serial bus, the graphical interface representing that device is grayed out, leaving a shadow of the graphical image until the device is re-coupled or the system is powered off."

With this background, it is respectfully submitted that there appears to be some disagreement here as to what the Mano patent is actually disclosing in Figures 1-4 and in the passages quoted above. In the embodiment illustrated in Figures 1-4, as described in the paragraph beginning at line 35 of column 4, the bus display window displays the devices which are coupled to the serial bus network and a graphical representation of the bus structure is shown connecting each of the representative devices together. A number of different devices are shown (as described in the first full paragraph in column 5, in connection with Figure 2). In the example of the digital camcorder 40 described in the first full paragraph of column 5, when camcorder 40 is first displayed within the bus display window 14, an animated data stream is illustrated within the representation of the bus structure 16 between the graphical representation of

the camcorder 40 and the graphical representation of the host computer 18 (column 5, lines 25-30). The graphical representation of the camcorder will be displayed in full color so long as the camcorder is coupled to the serial bus network. If the camcorder is removed, the graphical representation is grayed out, as discussed above.

It is respectfully submitted that there is no relationship whatsoever between the various devices shown in Figures 1-4 and the ports to which they are connected. The representation of the devices and their particular relationship, i.e., the order in which they appear, is essentially arbitrary and the display, i.e., the showing of the devices in Figures 1-4, is in no way dependent on any relationship between the addresses at which the various devices are connected. The focus in Mano is on displaying a device when the device is added to a serial bus, and graying out the graphical image representing the device when the device is removed from the serial bus. The graphical display of Mano does not take into account the particular port at which a device is connected, and is simply indifferent to the various addresses at which the various different devices are connected.

It is respectfully submitted that the teachings of the Mano patent, as properly interpreted, are not a disclosure of the present invention as claimed in claim 1. In this regard, it is respectfully submitted that Mano does not monitor a plurality of ports since the actual port to which a device is connected is a matter of indifference in the Mano system. More importantly, Mano clearly does not disclose configuring a user-interface operating on the information signal based on (i) the determined utilization by the devices of the ports of the plurality of ports and also on (ii) a defined relationship defined between the ports.

In previously responding to this argument, the Examiner has contended that “[b]y indicating that devices are or are not connected, the Mano interface is in fact presenting the ‘relationship’ of such a state” and that “[w]hen plural devices are shown as connected via plural ports in Mano, they have the ‘relationship defined between the ports’ of that connection status.” Again, it is respectfully submitted that what is shown in Figures 1-4 is not a depiction of any relationship between a particular device and a particular port, and, moreover, showing whether a device is connected or not connected does not represent a defined relationship defined between ports. In this regard, as indicated above, claim 1 recites configuring a user-interface based on both (i) the

determined utilization of the devices of the ports of a plurality of ports and (ii) a defined relationship defined between the ports. It is accepted that it may be argued that the first basis, the "determined utilization" of the device, corresponds to whether the devices are or are not connected, but, as noted, claim 1 also requires a second basis, i.e., that the configuring be based on a defined relationship defined between the ports, which is clearly something more than, and something different from, whether the devices are connected or not. It is respectfully submitted that the state of the connections of the devices (i.e., whether the devices are connected or not) cannot be read as both of the first and second bases claimed. Accordingly, it is respectfully submitted that claim 1 is patentably distinguished from the Mano reference.

In the Response to Arguments section of the current Office Action, it is contended that "a defined relationship between the ports" is "at least indicated by Mano's presenting a set of devices that are currently connection" and that "this establishes a 'relationship'." It is respectfully submitted that the "bus display window" 14 is the "user-interface" in Mano and that window 14, which represents the devices coupled to serial bus 16, simply indicates, at best, whether one or more of the devices (digital VCR, video printer, TV, etc) are connected to each other through the serial bus 16. Thus, when a device is connected to bus 16 at any location therealong this is simply represented by a connecting line in window 14 and there is no consideration as to which address location along the bus 16 the device is connected and there is no relationship between the representation and the location of the connection (the individual devices are always shown at the same locations and in the same order in the window that is depicted in, e.g., Figure 4). Thus, there is no defined relationship between the address locations on the bus 16 insofar as the "user-interface" (window 14) is concerned, whether physical (e.g., based on a geometrical relationship between the address locations or temporal (e.g., based on the order in which connections are made). Moreover, to the extent that the connection of, e.g., two devices to the bus establishes a "relationship" between the devices (i.e., that both are "connected devices"), it is respectfully submitted that the representation provided by the window is not based on a defined relation between the ports, particularly given that, as discussed above, claim 1 provides that the configuring step is based on both the determined utilization by the

devices of the ports of the plurality of ports and a defined relationship defined between the ports.

In the latter regard, applicant respectfully disagrees with the contention at page 7 of the Office Action that “utilization of a port by a device in Mano is the first basis and the relatedness of ports within Mano by having devices connected to them.” It is respectfully submitted that there is simply “no relatedness of ports in Mano” apart from “utilization [or not] of a port by a device” and certainly no defined relation.

The Examiner further contends that “a relationship *per se* must of necessity occur between the ports in Mano, by their simply being connected in a single system and appearing in a single display for that system. However, as indicated, there is no relationship of any kind between the “ports” shown in the window display 14 and the actual “ports” of bus 16 to which the devices are connected.

Claim 31 has been rejected under 35 USC 103(a) as being unpatentable over Mano in view of the newly cited Tsai reference. This rejection is respectfully traversed.

Considering the portions of the Tsai reference to which the Examiner refers, lines 29-67 of column 1 describe alternate embodiments wherein, in Figure 2A “series A receptacles are provided at the back of the computer case” and Figure 2B wherein the “series A receptacles are provided at the front face of a fake disk drive in the computer case as shown in Figure 2B.” Further, lines 12-30 of column 2, which describe the invention disclosed in the Tsai patent, simply state that a USB hub is provided in the front panel. Thus, it is respectfully submitted that the connections described in connection with any one implementation (whether in connection with the prior art or the Tsai invention) do not correspond to a “port located on a rear portion of a chassis” and a port “located on a front portion” as contended by the Examiner. Accordingly, it is respectfully submitted that claim 31 distinguishes over the combination of references proposed by the Examiner for at least this reason.

Turning to the response to this argument at page 7, while applicant stands by the contention that Tsai describes alternate embodiments and that this limits the relevance of Tsai, it is also important to understand that the only “ports” of interest in Mano are the “ports” associated with bus 16 since connections to bus 16 are what is represented in window 14, and that, moreover, bus 16 is not, and cannot be equated to, a “chassis” having “a front portion” and “a rear portion” as claimed.

Allowance of the application in its present form is respectfully solicited.

END REMARKS